

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CARDILLO & SONS, INC.,

Plaintiff,

v.

**OFFICIAL SECURITY, INC.
MRH INTERNATIONAL, INC.,
DARRYL CRONFELD, and
MARGARET R. CRONFELD,**

Defendants.

CIVIL ACTION NO. 04-12496-JLT

**JOINT STATEMENT AND SCHEDULING ORDER
PURSUANT TO LOCAL RULE 16.1**

Plaintiff Cardillo & Sons, Inc. (“CSI”) and the defendants Official Security, Inc., MRH International, Inc., Darryl Cronfeld and Margaret R. Cronfeld (the “Defendants”) (collectively the “Parties”) having by their counsel conferred pursuant to Fed.R.Civ.P. 26(f) and Local Rule 16.1 hereby submit the following Joint Statement in connection with the Scheduling Conference scheduled to take place on September 6, 2005.

1. **Matters To Be Discussed At Conference:** The parties will appear at the Scheduling Conference prepared to discuss the following issues: a proposed pre-trial schedule for the case that includes a plan for discovery; anticipated motions; alternative dispute resolution; discovery limits; and settlement.
2. **Pending Motions:** There are no Motions currently pending before the Court.
3. **Proposed Pretrial Schedule:** The parties have agreed on all dates within the below-listed pretrial schedule and have submitted a proposed order reflecting their agreement.

- (a) Initial Disclosures: Initial disclosures under Fed.R.Civ.P. 26(a) shall be completed on or before September 1, 2005.
- (b) Fact Discovery Cut-Off: All fact discovery (including the service of all interrogatories, requests for admissions, document requests and responses thereto, and the taking of all depositions) shall be completed on or before April 28, 2006.
- (c) Expert Discovery: It is not currently anticipated that the parties will need to conduct expert discovery. However, the parties agree to complete any expert discovery on or before April 28, 2006.
- (d) Motions:
 - (1) Amendments to pleadings shall be filed in accordance with Fed.R.Civ.P. 15(a).
 - (2) Dispositive Motions shall be filed no later than May 31, 2006.
- (e) Pre-Trial Conference. The parties will be prepared for a final pretrial conference on July 26, 2006 or a date thereafter convenient for the Court.

4. **Discovery Event Limitations**: The parties agree to abide by the discovery event limitations contained in Local Rule 26.1(C).

5. **Trial by Magistrate Judge**: The parties do not consent to trial by Magistrate Judge.

6. **Settlement**: Plaintiff will tender its written settlement proposal to Defendants ten days prior to the Rule 16 Conference.

7. **Rules 16.1(D)(3) Certifications:** The parties are submitting separately their certifications regarding consultation on litigation budgets and alternative dispute resolution as required by Local Rule 16.1(D)(3).

8. **Modification of the Schedule:** All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion to the Court for good cause shown.

Respectfully Submitted,

OFFICIAL SECURITY, INC.,
MRH INTERNATIONAL, INC.,
DARRYL CRONFELD and
MARGARET R. CRONFELD

By its and their Attorneys:

/S/ Robert M. Bonin
Robert M. Bonin, Esq., BBO# 049100
Bonin & Marashian
77 Franklin Street
Boston, MA 02110
(617) 723-2525

Dated: August 19, 2005

Respectfully Submitted,

CARDILLO & SONS, INC.

By its Attorneys:

/S/ John F. Tocci
John F. Tocci, Esq., BBO# 562139
Tocci, Goss & Lee, PC
35 India Street, 5th Floor
Boston, MA 02110
(617) 542-6200

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